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8 *Attorneys for Defendant*  
9 *Google Inc.*

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11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN JOSE DIVISION**

14 IN RE: HIGH-TECH EMPLOYEE  
15 ANTITRUST LITIGATION

16 THIS DOCUMENT RELATES TO:  
17 ALL ACTIONS

**Master Docket No. 11-CV-2509-LHK**

**DECLARATION OF ANNE M. SELIN  
IN SUPPORT OF DEFENDANTS'  
JOINT ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL DATED  
JANUARY 9, 2013**

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21 I, Anne M. Selin, declare as follows:

22 1. I am an attorney with the law firm of Mayer Brown LLP, counsel for Defendant  
23 Google, Inc. ("Google") in the above-captioned matter. I am admitted to practice law before this  
24 Court. I submit this declaration in support of Defendants' Joint Administrative Motion to File  
25 Under Seal that is being filed concurrently herewith. As an attorney involved in the defense of  
26 this action, unless otherwise stated, I have personal knowledge of the facts stated in this  
27 declaration and if called as a witness, I could and would competently testify to them.  
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1           2.       The Declaration of Frank Wagner in Support of Administrative Motion to Seal  
2 Information Included in Plaintiffs' Reply Papers executed on December 14, 2012 (Dkt. No. 261)  
3 ("Frank Wagner Reply Sealing Decl.") addresses, among other items, portions of transcript  
4 excerpts from the deposition of Kevin M. Murphy, Ph.D, dated December 3, 2012 ("Murphy  
5 Deposition"). Frank Wagner Reply Sealing Decl. ¶4(c).

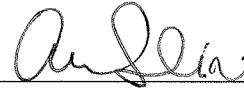
6           3.       In his declaration, Mr. Wagner testified that portions of the Murphy Deposition  
7 transcript excerpts (attached to Plaintiffs' Reply papers as Exhibit 13 to Declaration of Dean M.  
8 Harvey)—namely pages 260:11-25, 284:14-20, and 294:15-25 of the Murphy Deposition  
9 Transcript—reflect "confidential and highly sensitive information about Google's compensation  
10 practices" the disclosure of which would "likely cause competitive harm to Google by giving  
11 third parties (including Google's competitors in the labor market) direct insight into highly  
12 confidential and competitively sensitive aspects of Google's internal decision-making processes  
13 related to its business operations." *Id.* at ¶ 4.

14           4.       On January 9, 2013, Defendants filed their Joint Administrative Motion for Leave  
15 to Supplement the Record in Support of Defendants' Opposition to Plaintiffs' Motion for Class  
16 Certification ("Motion for Leave to Supplement"). In that motion, Defendants seek to  
17 supplement the record with, among other items, additional excerpts from the Murphy Deposition  
18 in order to provide necessary context and clarification.

19           5.       I have reviewed the Motion for Leave to Supplement and the additional excerpts  
20 from the Murphy Deposition that are attached as Exhibit A to the Declaration of Eric Evans in  
21 Support of Defendants' Motion for Leave to Supplement. A portion of these additional  
22 transcript excerpts—namely pages 261:1-25, 262:1-25, and 263:1-25—are a continuation of Dr.  
23 Murphy's testimony on the same subject matter recorded on page 260, which Mr. Wagner  
24 previously testified reflected confidential and highly sensitive information about Google's  
25 compensation practices. Therefore, the disclosure of the contents of pages 261 through 263 of  
26 the Murphy Deposition transcript would also likely cause competitive harm to Google by giving  
27 third parties (including Google's competitors in the labor market) direct insight into highly  
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1 confidential and competitively sensitive aspects of Google's internal decision-making processes  
2 related to its business operations.

3 I declare under penalty of perjury under the laws of the United States of America that the  
4 foregoing is true and correct. Executed on January 9, 2013 in Palo Alto, California.

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